



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

FAXED: DECEMBER 20, 2006

December 20, 2006

Mr. Samuel Kevin Wilson
City of Vernon
Planning Department
4305 Santa Fe Avenue
Vernon, CA 90058

Dear Mr. Wilson:

Negative Declaration for Geogreen Biofuels (November 2006)

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated in the Final Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Negative Declaration. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS: CB

LAC061128-03
Control Number

**Negative Declaration for Geogreen Biofuels:
(November 2006)**

1. **Project Construction Emissions:** The project description does not provide any information regarding any structures that may have to be built to hold the biodiesel processing equipment. If the proposed project involves any built structures, it is requested that the lead agency provide information on the size of structure, the type and number of equipment that would be involved in grading and construction of the proposed facility. The lead agency may use the calculation methodologies in the 1993 SCAQMD CEQA Air Quality Handbook or the California Air Resources Board (CARB)-approved URBEMIS 2002 model to estimate project construction emissions. The URBEMIS Model can be accessed at the SCAQMD website at: www.aqmd.gov/ceqa/models.html.
2. **Project Operational Emissions:** The project description also does not provide any information regarding the volume of the raw materials especially the vegetable oils that would be processed at the facility, the number of truck trips that would be involved in delivering this raw material to the facility and transporting finished product away from the facility and the emissions that would be generated by these trucks. CARB has designated diesel particulates from trucks as a carcinogen. It is therefore important that the truck traffic and truck emissions are adequately analyzed to determine whether or not mitigation would be required. Depending on the volume of truck traffic that would be generated by the proposed project, the SCAQMD recommends that the lead agency perform an air toxics health risk analysis of the diesel particulate emissions. The SCAQMD has prepared interim guidance for preparing such an analysis, which can be accessed at the SCAQMD website: www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html.
3. **Mitigation Measures:** Should project emissions exceed the SCAQMD-approved significance thresholds, the following measures are recommended for the lead agency to consider where applicable or feasible:
 - For construction equipment, require the use of alternative clean fuel such as compressed natural gas-powered equipment with oxidation catalysts instead of diesel-powered engines, or if diesel equipment has to be used, use particulate filters, oxidation catalysts and low sulfur diesel as defined in AQMD Rule 431.2, i.e., with less than 15 ppm sulfur content.
 - Trucks hauling dirt, sand, gravel or soil are to be covered or shall maintain at least two feet of freeboard in accordance with Section 23114 of the California Vehicle Code.
 - Pave parking areas and construction access roads to the main roads to avoid dirt being carried on to the roadway.
 - Use alternative-fueled yard tractors and other service equipment.
 - Provide electrical sources for docking of trucks.
 - Restrict idling emissions by using auxiliary power units and electrification.

- Enforce truck parking restrictions.

Other mitigation measures for consideration by the lead agency can be found in Chapter 11 of the Handbook.

4. **SCAQMD Permits**: The lead agency should be aware that requirements in the Bay Area for industrial facilities may be very different than requirements in the South Coast area. For example, it is likely that the proposed facility would be subject to SCAQMD Rule 201 – Permit to Construct, and Rule 203 – Permit to Operate. However, some parts of the processing equipment may be exempt as under SCAQMD Rule 219 – Equipment not Requiring a Written Permit Pursuant to Regulation II. Please provide a process description and block flow diagram indicating liquid and vapor inlets and outlets to help determine permitting applicability.